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Federal Communications Commission

RE: Response to comments by Steve Waterman, Winlink Radio Email System Administrator, on
Docket No. 17-344

I'm a masters' degree electrical engineer who went into the practice of medicine and now for the past 3 years have been much more engaged in driving more competency in amateur radio emergency communications in the north Florida area. I have provided a WINLINK gateway station for amateur use for > 2 years, and now one for DHS SHARES usage for > 18 months. My public gateway passes about a megabyte of information per week for boaters and others. I have written two books on Amateur Radio emergency communications, and am holding a Symposium in 3 weeks to teach more about skills, assets, strategies and Full Scale Exercises.

Regarding Steve Waterman's excellent comments:

- (2) The inability to obscure private data in emergencies is a severe problem for amateur radio operators. The official position of the Georgia ARES group appears to be to refuse to transmit medical information, even though it might be lifesaving, based on my conversations with them recently, at their Annual meeting. As a physician, I believe this is dangerous and short-sighted, since my reading of the Security Rule does not require encryption of transmissions in all cases, and the Privacy Rule has significant statements requiring "Addressing" the issue, which are apparently misunderstood by litigation- and prosecution-wary amateur radio groups. Who can blame them? But I as a physician must say it is the responsibility of the federal government to solve that problem.

Even if you make a statement indicating "life threatening" risks justify usage of FCC regulations allowing violation on non-encryption regulations, this still won't allow amateur radio groups involved in emergency communications to PRACTICE such patient-data-protection techniques.

I believe the FCC should promulgate new regulation making it clear that in such emergency circumstances, effective encryption may be utilized, and in a suitably limited fashion, practice of such communications is also allowed.

- (3) I agree with Steve Waterman that the space available for higher speed transmissions – and the space allocated for automatic operation is far too constricted for a technologically advancing

amateur radio service.

(4) I agree with Steve Waterman that the symbol rate limitation has to go.

Sincerely,

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